

EXHIBIT M

Vladimir Iakovlev, M.D.

1 CAUSE NO. 2012-CI-18690

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3 JENNIFER RAMIREZ F/K/A) IN THE DISTRICT COURT

4 JENNIFER GALINDO,)

5 Plaintiff,)

6 v.) 438th JUDICIAL DISTRICT

7 CESAR REYES, M.D.,)

8 JOHNSON & JOHNSON,)

9 AND ETHICON, INC.,)

10 Defendant.) BEXAR COUNTY, TEXAS

11 -----)

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14 --- This is the Videotaped Deposition of VLADIMIR
15 IAKOVLEV, M.D., taken at the Hilton Hotel,
16 University Room, 145 Richmond Street West,
17 Toronto, Ontario, on the 19th day of April, 2016.

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21 REPORTED BY: HELEN MARTINEAU

22 CERTIFIED SHORTHAND REPORTER

23

24 VIDEOGRAPHER: DAVID LANE

Vladimir Iakovlev, M.D.

1 the slices of the bread, so to speak. Alright?

2 A. If you want to use that analogy,
3 yes, we can.

4 Q. And the Ramirez slides were
5 processed the same way that you've processed
6 slides for other litigation, is that correct?

7 A. For all specimens processed in the
8 lab, all labs in North America use exactly the
9 same process.

10 Q. Okay.

11 A. And we use the same machinery. We
12 use the same chemicals. Everything is processed
13 the same way.

14 Q. Let's talk about how it was done
15 here in Canada, okay?

16 A. It's not just in Canada. It's done
17 the same way anywhere in the world.

18 Q. I understand. It was done pursuant
19 to the St. Michael's protocol, is that right?

20 A. I'm telling you this is not our
21 protocol. It's a machine which is made maybe in
22 United States, maybe in Europe and chemicals are
23 likely made in the United States. They are bought
24 in large supplying companies. Everything is

Vladimir Iakovlev, M.D.

1 REPORTER'S CERTIFICATE

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3 I, HELEN MARTINEAU, CSR, Certified

4 Shorthand Reporter, certify;

5 That the foregoing proceedings were
6 taken before me at the time and place therein set
7 forth at which time the witness was put under oath
8 by me;

9 That the testimony of the witness and
10 all objections made at the time of the examination
11 were recorded stenographically by me and were
12 thereafter transcribed;

13 That the foregoing is a true and
14 accurate transcript of my shorthand notes so
15 taken.

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19 PER: HELEN MARTINEAU

20 CERTIFIED SHORTHAND REPORTER

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